## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA Plaintiffs

Vs.

[1] LUIS OMAR CARRASQUILLO-VELAZQUEZ Defendant CRIM. NO. 21-mj-00774-BJM

## MOTION TO CONTINUE DETENTION DUE TO CALENDAR CONFLICT

## TO THE HONORABLE COURT:

COMES NOW Manuel L. Morales-Schmidt, Esq., legal representative for Luis Omar Carrasquillo-Velazquez, and respectfully states and prays as follows:

- On June 15, 2021, this Honorable Court issued an order setting the detention hearing on instant case for June 18, 2021, at 10:30 am via VTC before Magistrate Bruce J. McGiverin (Docket No. 4).
- 2. On the said date and time, undersigning attorney will be at a previously scheduled Preliminary Hearing at Aibonito Superior Court in case *Puerto Rico v. Jay O'Neill Gonzalez Mercado*, B1VP202100003 thus will not be able to appear at the scheduled detention hearing on Defendant's behalf. Said case has four defendants and was scheduled a month ago taking into account attorney's calendars and requiring in-court presence of defendants.
- 3. Undersigning attorney has available the following dates for the detention hearing; June 21,22, both in the afternoon and June 24 all day.
- 4. Therefore, undersigning attorney respectfully requests that the detention hearing date of

June 18, 2021 be vacated and reset, for any of the following dates: June 21, 22, both in the afternoon and June 24 all day.

**WHEREFORE**, for the reasons set forth above, Defendant respectfully requests that this Honorable Court vacate the detention hearing scheduled for June 18, 2019 and reset it for any of the dates previously informed herein.

## RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of June 2021.

**I HEREBY CERTIFY** that on this same date, a true and exact copy of this document has been filed using the CM/ECF system and that the government and all counsel of record will be served a copy of this motion.

/S/Manuel L. Morales Schmidt

Manuel L. Morales-Schmidt

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